

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DeAndre Crawford,

Plaintiff,

v.

Charles Best, et al.,

Defendants.

Case Number 1:18-cv-4882

Judge Mary M. Rowland

**JOINT STATUS REPORT AND STIPULATED MOTION TO EXTEND DISCOVERY
SCHEDULE**

Pursuant to the Court's August 3, 2020 order (ECF No. 105), the parties hereby submit the following Joint Status Report and Stipulated Motion to Extend Discovery Schedule:

1. Discovery in this matter is nearing completion. The parties believe they have served all necessary discovery. Plaintiff and Defendants have exchanged written discovery and produced nearly all responsive materials. The parties have also conducted 8 depositions so far.

2. Although the parties do not anticipate serving any further discovery, they require some additional time to complete outstanding discovery. In particular, the parties will be unable to schedule and complete 4 depositions (three fact witnesses and one 30(b)(6) deposition) prior to the discovery completion date. In addition, there are a small number of document requests outstanding (e.g. requests for certain x-ray films and photographs). The parties have met and conferred on these issues and believe that they will be able to complete them before the end of January.

3. In light of the above, the parties request that the Court extend the discovery deadline. The current discovery schedule and the proposed amended schedule are set forth below:

	Current Deadline	Proposed Deadline
Close of Fact Discovery	December 14, 2020	January 29, 2021
Plaintiff's Expert Disclosures	December 29, 2020	February 19, 2021
Deadline for Deposing Plaintiff's Experts	N/A	March 19, 2021
Defendants' Expert Disclosures	January 28, 2021	April 2, 2021
Deadline for Deposing Defendants' Experts	N/A	April 30, 2021
Plaintiff's Rebuttal Expert Disclosures	February 25, 2021	May 14, 2021
Close of Expert Discovery and Deadline for All Expert Depositions	March 16, 2021	May 28, 2021
Dispositive Motion Deadline	To be determined following the close of discovery	June 28, 2021
Opposition to Dispositive Motions	N/A	July 28, 2021
Reply in Support of Dispositive Motions	N/A	August 11, 2021

4. The requested extension is made in good faith and not for the purposes of delay. This is the parties' second request to extend the discovery schedule.

5. Pursuant to the Court's August 3, 2020 order, the Parties have set forth a proposed summary judgment briefing schedule in the above case management schedule.

6. The parties were unable to reach agreement regarding whether a settlement conference would be productive at this time.

December 18, 2021

Respectfully submitted,

/s/ Samuel P. Myler

Mark McLaughlin
Marc R. Kadish
Samuel P. Myler
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606-4637
Tel: (312) 782-0600
Fax: (312) 706-8238
Counsel for Plaintiff

/s/ Brett R. Furmanski

Brett R. Furmanski
Cassiday Schade LLP
222 W. Adams St., Suite 2900
Chicago, IL 60606
(312) 641-3100
Counsel for Wexford Defendants

/s/ Jonathon Kangwa

Jonathon Kangwa
Assistant Attorney General
Office of the Illinois Attorney General
100 W. Randolph St., 13th Fl.
Chicago, Illinois 60601
(312) 814-7201
Counsel for State Defendants

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2020, a copy of the foregoing was submitted to the Court via ECF. Courtesy copies of this document were sent via electronic mail to all counsel of record at the electronic mail addresses provided in connection with their appearances in this case.

/s/ Samuel P. Myler
Counsel for Plaintiff